

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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E. JEAN CARROLL,

Civil Action No.:
22-cv-10016 (LAK)

Plaintiff,

– against –

DONALD J. TRUMP,

Defendant.

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DECLARATION OF MATTHEW G. DeOREO

I, MATTHEW G. DeOREO, declare as follows under the penalty of perjury:

1. I respectfully submit this Declaration in opposition to Plaintiff's Omnibus Motion *in Limine*.
2. The sole purpose of this Declaration is to submit Exhibits to the Court. These exhibits are as follows:
 - a. **Exhibit 1:** Defendant's Memorandum of Law in support of his Motion *in Limine* in *Carroll v. Trump*, No. 1:20-cv-7311-LAK-JLC (ECF No. 131)(“*Carroll I*”);
 - b. **Exhibit 2:** the February 16, 2023 Declaration of Alina Habba filed in support of Defendant's Motion *in Limine* in *Carroll I* (ECF No. 132)(“Habba Declaration”);
 - c. **Exhibit 3:** Exhibit A to the Habba Declaration (ECF No. 132-1);
 - d. **Exhibit 4:** Exhibit B to the Habba Declaration (ECF No. 132-2);

- e. **Exhibit 5:** Defendant's Memorandum of Law in opposition to Plaintiff's Motion *in Limine* in *Carroll I* (ECF No. 136);
- f. **Exhibit 6:** the February 23, 2023 Declaration of Alina Habba filed in opposition to Plaintiff's Motion *in Limine* in *Carroll I* (ECF No. 137) ("Habba Opposition Declaration");
- g. **Exhibit 7:** Exhibit A to the Habba Opposition Declaration (ECF No. 137-1);
- h. **Exhibit 8:** Exhibit B to the Habba Opposition Declaration (ECF No. 137-2);
- i. **Exhibit 9:** Exhibit D to the Habba Opposition Declaration (ECF No. 137-4);
- j. **Exhibit 10:** Exhibit E to the Habba Opposition Declaration (ECF No. 137-5); and
- k. **Exhibit 11:** Defendant's Reply Memorandum of Law in further support of his Motion *in Limine* in *Carroll I* (ECF No. 140).

3. I declare under the penalty of perjury that the foregoing is true and correct.

Dated: New York, New York

March 9, 2023



MATTHEW G. DeOREO